

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN THE MATTER OF:

Chapter 13

Leona Ford,

Case No. 06-00074

Debtor(s).

Honorable John H. Squires

**RESPONSE TO TRUSTEE'S NOTICE OF PAYMENT
OF FINAL MORTGAGE CURE AMOUNT**

NOW COMES EverHome Mortgage (hereinafter "EverHome"), by and through its attorneys, Heavner, Scott, Beyers and Mihlar, LLC, and for its Response to Trustee's Notice of Payment of Final Mortgage Cure Amount, states as follows:

1. On or about March 6, 2006, EverHome filed its Proof of Claim as Claim Number 4 for a sum of \$18,680.27 in pre-petition arrears.

2. The Debtor's Modified Chapter 13 Plan filed on March 26, 2006 and confirmed on April 26, 2006 set-forth a pre-petition arrearage amount owed to EverHome \$18,680.27.

3. EverHome's pre-petition arrears of \$18,680.27 were paid by the Chapter 13 Trustee in full.

4. The Debtor's post-petition payments to EverHome were to be paid by the Debtor directly "outside" of the plan. The Debtor is currently due for the September 1, 2011 post-petition payment in the amount of \$1,611.84.

5. As of February 1, 2011, Everhome had an escrow advance of \$25,008.14. On February 1, 2011, EverHome filed a Notice of Payment Change increasing the monthly post-petition payments to \$1,611.84 effective March 1, 2011. Per Notice of Payment Change, the advance will be collected

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over a period of forty eight months through the increased monthly payment amount. A copy of the filed Notice of Payment Change is attached hereto.

WHEREFORE, EverHome Mortgage prays that the Court declare that the loan is not current at this time but that the delinquency will be collected through increased monthly payments.

EVERHOME MORTGAGE,

By: /s/ Heather M. Giannino
One of its attorneys

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